

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR (DRAFT PERMIT) No. F-04-020  
DURO STANDARD PRODUCTS COMPANY, LLC  
FLORENCE, KY  
JULY 26, 2004  
MARK LABHART, REVIEWER  
PLANT I.D. # 021-015-00019  
APPLICATION LOG # 51208

**SOURCE DESCRIPTION:**

The source manufactures paper bags to which an image is applied (type and art). Wide-web flexographic presses used to apply images are the primary source of emissions from this facility. Currently there are (61) flexographic presses. There are also (2) parts cleaners classified as insignificant activities and (2) facility boilers, (59:015).

**COMMENTS:**

Duro Standard Products Company has requested a Conditional Major permit since anticipated actual emissions are below major source thresholds. This is due to the exclusive use of water-based inks.

- Prior to August 30, 2002, Boone county was designated moderate, non-attainment, for ozone, hence Regulation 401 KAR 59:212, New graphic arts facilities using rotogravure and flexography, applied to the facilities in existence at this time. Operation procedures required by 59:212, for the existing facilities must continue to be practiced per Regulation 50:012, Section 1 (5).
  - The permittee shall continue to use water base inks as described in Regulation 401 KAR 59:212, Section 6 (1).
- Regulation 40 CFR Part 63, Subpart KK—National Emission Standards for the Printing and Publishing Industry is applicable. This source is subject only to the provisions of § 63.829(d) and § 63.830(b)(1) of this subpart, as the Conditional Major permit will limit emissions to below major source thresholds.

Emissions for the flexographic presses were determined by material balance.

Emissions from the boilers are based on AP-42 factors.

Emissions from the parts cleaners were determined by material balance.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

Operating limitations shall be, VOC emissions no more than 20 TPY and single HAP emissions no more than 9.0 TPY.

**OPERATIONAL FLEXIBILITY:**

Duro Standard is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.